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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

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UNITED STATES OF AMERICA,	}	CR No(s).CR 11-0804 MMC
Plaintiff,	}	
v.	}	STIPULATION AND [PROPOSED]
MIMI WANG,	}	ORDER CHANGING HEARING DATE
Defendant.	}	

Since the last calling of the case, the parties have engaged in disposition discussions regarding Ms. Wang's case. This continuance is sought by counsel for the defense in order to provide additional time for effective preparation of counsel. Counsel for the defense anticipates reaching a resolution of Ms. Wang's case in the next few weeks. To preserve the Court's time, and to avoid the dislocation for the defendant that travel to Court entails, the parties propose moving the hearing date. Therefore, the parties respectfully request that the Court move the next hearing from January 18, 2012 to February 1, 2012.

No party objects to the requested continuance.

The parties request that the period from January 18, 2012 through February 1, 2012 also

STIPULATION AND [PROPOSED] ORDER CHANGING HEARING DATE

1 be excluded from any time limits applicable under 18 U.S.C. § 3161. The parties agree that
2 granting the exclusion would allow the reasonable time necessary for effective preparation of
3 counsel and would preserve continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
4 parties also agree that the ends of justice served by granting such an exclusion of time outweigh
5 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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8 SO STIPULATED:
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10 DATED: January 17, 2012

/s/

11 JOHN RUNFOLA
12 Attorney for ~~CARL PITTS~~

13 DATED: January 17, 2012

/s/

14 DAMALI TAYLOR
15 Assistant United States Attorney

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17 [PROPOSED] ORDER

18 For the reasons stated above, the Court finds good cause to change the date for the next
19 hearing from January 18, 2012 to February 1, 2012. The Court also finds that the exclusion from
20 the time limits applicable under 18 U.S.C. § 3161 of the period from January 18, 2012 through
21 February 1, 2012 is warranted and that the ends of justice served by the continuance outweigh
22 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A).

23 The failure to grant the requested exclusion of time would deny counsel for the defendant and for
24 the government the reasonable time necessary for effective preparation, taking into account the
25 exercise of due diligence, and would result in a miscarriage of justice. 18 U.S.C.
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27
28 STIPULATION AND [PROPOSED] ORDER CHANGING HEARING DATE

1 §3161(h)(7)(B)(iv).

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3 IT IS SO ORDERED.

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5 DATED: January 17, 2012


THE HONORABLE JUDGE MAXINE CHESNEY
United States District Judge

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28 STIPULATION AND [PROPOSED] ORDER CHANGING HEARING DATE